

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

A.O.A., et al.)	
)	
Plaintiffs,)	
)	Case No.: 4:11-cv-00044-CDP
v.)	(CONSOLIDATED)
)	
DOE RUN RESOURCES)	
CORPORATION, et al.,)	
)	
Defendants.)	

CONSENT MOTION FOR LEAVE TO APPOINT NEUTRAL

Pursuant to the Court's Order entered on October 7, 2019, the parties notified the Court on January 6, 2020 of their agreed choice of Neutral, John W. Perry. While the parties have agreed to the selection of Mr. Perry, Mr. Perry is not a member of the Court's Certified Neutral List. Nonetheless, Mr. Perry is highly qualified to serve as Neutral.

Mr. Perry is a partner in the law firm of Perry, Balhoff, Mengis & Burns and a founding principal of the mediation firm of Perry Dampf Dispute Solutions, where he is responsible for the selection and training of the mediator panel. He has practiced as both a civil defense attorney and a plaintiff's attorney and has served on both the Louisiana Association of Defense Counsel Board of Directors and the Louisiana Trial Lawyers Association Board of Governors.

Mr. Perry has served as mediator, arbitrator, and/or Special Master in over 4,500 cases since 1995, in both federal and state court, including serving as mediator before this Court in *In re: Genetically Modified Rice Litigation*, MDL No. 1811 (E.D. Mo. J.P.M.L.). A copy of Mr. Perry's curriculum vitae is attached hereto. Additional work includes:

- *In re: General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (S.D.N.Y. J.P.M.L.)
(mediator and Special Master)

- *In re: Aredia and Zometa Products Liability Litigation*, MDL No. 1760 (M.D. Tenn. J.P.M.L.) (mediator)
- *In re: Oil Spill by the Oil Rig “Deepwater Horizon” in the Gulf of Mexico, on April 20, 2010*, MDL No. 2179 (E.D. La. J.P.M.L.) (Court-Designated Neutral)
- *In re: FEMA Trailer Formaldehyde Products Liability Litigation*, MDL No. 1873 (E.D. La. J.P.M.L.) (mediator)
- *In re: Chinese-Manufactured Drywall Products Liability Litigation*, MDL No. 2047 (E.D. La. J.P.M.L.) (mediator and Special Master)
- *In re: Coloplast Corp. Pelvic Support Systems Products Liability Litigation (Vaginal Mesh)*, MDL No. 2387 (S.D.W.Va. J.P.M.L.) (mediator)
- *In re: Pradaxa (Dabigatran Etexilate) Products Liability Litigation*, MDL No. 2385 (S.D. Ill. J.P.M.L.) (mediator)
- *In re: Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Products Liability Litigation*, MDL No. 2100 (S.D. Ill. J.P.M.L.) (mediator)
- *Patrick Joseph Turner, et al. v. Murphy Oil USA, Inc. (Murphy Oil Spill)*, 05-4206 (E.D. La.) (mediator)
- *Terral Evans, et al. v. TIN, et al. (Bogalusa Fish Kill)*, 2:11-0267 (E.D. La.) (mediator)
- *Mass Depakote Litigation*, 12-52, etc. (S.D. Ill.) (mediator)
- *Ian Pollard, et al. v. Remington Arms Co., et al.*, 4:13-00086 (W.D. Mo.) (mediator)
- *Medtronic Infuse Litigation* (multiple jurisdictions) (mediator)
- *In re: Vulcan Litigation – April 2001 Incidents*, 69,388 (La. 23rd J.D.C.) (Special Master)
- *Avandia Deceptive Marketing Litigation* (multiple jurisdictions) (mediator)

- *Jane Doe No. 1, et al. v. The Johns Hopkins Health System Corporation, d/b/a The Johns Hopkins Hospital, et al.*, 24-C-13-00141 (Md. Baltimore City Cir. Ct.) (mediator)

Plaintiffs respectfully request that the Court approve the parties' agreed-upon selection of John W. Perry as Neutral, pursuant to the Court's October 7, 2019 Order referring the case to alternative dispute resolution.

January 10, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th day of January, 2020, a copy of the foregoing document was filed with the Clerk of the Court to be served upon counsel of record via the Court's ECF system.

/s/ Elizabeth Wilkins